

EXHIBIT I

HIGHLY CONFIDENTIAL PURSUANT TO PO
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION
CASE NO. 3:23-cv-03417-VC

RICHARD KADREY, et al., :
Individual and Representative :
Plaintiff, :
v. :
META PLATFORMS, INC., a Delaware :
Corporation, :
Defendant. :

----- x

VIDEOTAPE DEPOSITION OF:
TA-NESHI COATES
NEW YORK, NEW YORK
THURSDAY, NOVEMBER 21, 2024

REPORTED BY:
SILVIA P. WAGE, CCR, CRR, RPR
JOB NO. 6985779

1 HIGHLY CONFIDENTIAL PURSUANT TO PO

2 THE WITNESS: Oh, sorry.

3 A. No, I don't. 15:40:53

4 Q. Okay. And as is the case 15:40:56

5 with chats, Mr. Coates, I would like to 15:40:59

6 confirm. 15:41:02

7 The chats in blue are from you? 15:41:02

8 A. Yes, they are. 15:41:06

9 Q. Okay. Who posted the Axios 15:41:07

10 article on "weight-loss drugs could 15:41:10

11 become a test case for AI"? 15:41:13

12 A. I did. 15:41:14

13 Q. And then you told your group, 15:41:15

14 "this will end well"? 15:41:17

15 A. Yes, I was being sarcastic. 15:41:19

16 Q. Okay. And then you and 15:41:22

17 Ricardo have a back and forth you say, 15:41:30

18 "They are so clearly selling." 15:41:32

19 A. Yes. 15:41:34

20 Q. What did you mean by that? 15:41:34

21 A. Oh, so he -- Ricardo -- one 15:41:39

22 of our general conversations is that the 15:41:42

23 term AI -- Rick, I think, very astutely 15:41:44

24 often says that he wants to know what the 15:41:49

25 specific technology is and that "AI" is 15:41:51

1 HIGHLY CONFIDENTIAL PURSUANT TO PO
2 kind of used as a title for all sorts of 15:41:53
3 things. 15:41:55
4 And so I saw this -- and he says, 15:41:56
5 "I'm really getting to the point where 15:41:58
6 every time I see an article with 'AI' in 15:42:00
7 it, I shrug my shoulder and hang my head 15:42:02
8 a bit." And this one from someone, 15:42:05
9 actually, interested in the field. 15:42:05
10 And I wrote, "They're so clearly 15:42:08
11 selling." 15:42:09
12 And what I meant by that was that 15:42:09
13 AI is kind of used as a branding. It's 15:42:11
14 not clear what the technology is that 15:42:13
15 they're, actually, talking about. 15:42:15
16 And then he follows up, "And 15:42:18
17 feeding the speculative bubble." 15:42:19
18 It's the idea that AI is, at least, 15:42:21
19 in our opinion often used as a kind of 15:42:23
20 branding tool, not a reference to a 15:42:26
21 particular technology. 15:42:28
22 Q. But, with respect to Meta, 15:42:31
23 you understand that AI is not a "branding 15:42:32
24 tool," it's an actual technology? 15:42:35
25 A. I understand it as a reference 15:42:36

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2 MR. RATHUR: Same objection. 15:50:43

3 A. Yeah. I don't know. Because 15:50:43
4 one of my great frustrations is I don't 15:50:44
5 really have paucity, because I'm a 15:50:47
6 professional writer. I don't have the 15:50:49
7 capacity to stay in contact with, you 15:50:51
8 know -- I've sent, you know, quite a few 15:50:52
9 off to, for instance, graduate programs. 15:50:54
10 I get to, you know, obtain MFAs but you 15:50:56
11 generally lose contact after that. 15:50:59

12 Q. Right. Are you able to 15:51:01
13 identify any one of your former students 15:51:02
14 that have gone on to make a living from 15:51:05
15 writing and writing alone? 15:51:07

16 A. Not off the top, no. 15:51:08

17 Q. Okay. So back to the text. 15:51:11

18 A. Yeah. 15:51:13

19 Q. Mr. Gutierrez responds to 15:51:17
20 your post by saying, "On the positive 15:51:19
21 side, for the artist" -- 15:51:21

22 A. Sorry. Yes, I am. Sorry. 15:51:22
23 Gabby Duvall, she actually got a deal 15:51:24
24 through my agent, actually. She was my 15:51:27
25 student when I was at NYU. She's writing 15:51:29

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1		
2	a book right now.	15:51:30
3	Q. Other than Gabby Duvall --	15:51:30
4	A. Duvall.	15:51:33
5	Q. -- any others come to mind?	15:51:34
6	A. I'm sure there are more. I	15:51:35
7	teach on average -- I have taught on	15:51:37
8	average like 50 kids a semester.	15:51:39
9	Q. And you've been teaching for?	15:51:41
10	A. Yeah, yeah, yeah. But she's	15:51:42
11	the one who is most present who I	15:51:44
12	remember.	15:51:46
13	Q. Okay. Alright. Let's go	15:51:46
14	back to the chat thread.	15:51:48
15	After you post about Colin	15:51:50
16	Kaepernick, Mr. Gutierrez says, "On the	15:51:53
17	positive side for the artist, 4 million	15:51:55
18	will barely move the needle for what he's	15:51:58
19	saying he wants to do. So maybe fail to	15:52:01
20	launch."	15:52:03
21	A. Yes.	15:52:04
22	Q. And then the rest, the next	15:52:04
23	two posts are yours, right?	15:52:07
24	A. Yes.	15:52:09
25	Q. And can you read the second	15:52:09

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2 one? 15:52:11

3 A. It looks like -- oh, I'm 15:52:12

4 sorry the second one. "Users interact 15:52:13

5 with the chat bot to create a character" 15:52:15

6 --

7 THE STENOGRAPHER: Can you

8 just read a little slower.

9 THE WITNESS: Oh, I'm so

10 sorry. Forgive me.

11 THE STENOGRAPHER: That's

12 okay. That's okay. Go ahead. 15:52:21

13 A. "Users interact with a chatbot 15:52:21

14 to create a character, flesh out their 15:52:26

15 back story and traits and build a 15:52:29

16 narrative. Then they use an image 15:52:31

17 generation tool to illustrate the 15:52:33

18 character and their journey. 'You can go 15:52:36

19 back and forth with your AI companion and 15:52:37

20 test ideas. 'I want to change the 15:52:40

21 ending' or 'I want it to be more comedic 15:52:42

22 or dramatic,' he says." 15:52:46

23 Q. And then at the bottom of the 15:52:50

24 page, you quote what Kaepernick hopes the 15:52:51

25 platform will do. 15:52:57

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2 A. Hmm. Would you like me to 15:52:58
3 read it? 15:53:00

4 Q. Sure. 15:53:00

5 A. "Kaepernick hopes that the 15:53:01
6 platform will appeal to aspiring creators 15:53:03
7 with gaps in their skill sets. Whether 15:53:06
8 that means athletes who have a story and 15:53:07
9 an audience but lack illustrating chops 15:53:10
10 or content creators who are having 15:53:12
11 trouble monetizing their work." 15:53:14

12 Q. And then you go on to say 15:53:16
13 this reflects your view; in other words 15:53:18
14 people, who have not studied writing or 15:53:20
15 art? 15:53:22

16 A. Yeah. 15:53:22

17 Q. And that upsets you? 15:53:23

18 A. Yeah. 15:53:24

19 MR. RATHUR: Objection to 15:53:25
20 form. 15:53:27

21 A. Yes, it does upset me. 15:53:27

22 Q. If someone is a full-time 15:53:29
23 athlete and doesn't have time to take a 15:53:31
24 writing class or wants to tell their 15:53:32
25 story, you object to this being the 15:53:34

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2 method that they do so? 15:53:35

3 A. I do, I do. And I object 15:53:36

4 because there are methods and one of 15:53:39

5 those methods -- weirdly enough Colin was 15:53:41

6 engaged to do, in fact -- is that you 15:53:45

7 work with a writer. There are always to 15:53:46

8 tell your story. Those things do not 15:53:48

9 lack. 15:53:51

10 But I think attempting to shortcut 15:53:51

11 that process and, actually, shortcutting 15:53:53

12 maybe paying for it is something I object 15:53:56

13 to. 15:53:59

14 Q. And then Ricardo responds, 15:54:00

15 "You're asking for details. The hand 15:54:02

16 waving is all the details you need." 15:54:04

17 A. Yes, because I think the 15:54:06

18 other part of this is that we probably 15:54:07

19 were sceptical of the whole endeavor. 15:54:09

20 And I think -- and I don't have the 15:54:12

21 sort of expertise, but I believe Rick was 15:54:13

22 skeptical that the amount of money would 15:54:16

23 actually do the thing that he was 15:54:16

24 claiming it would do. 15:54:18

25 Q. Have you done any follow-up 15:54:18

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2 research on the venture since you posted 15:54:21
3 this in July? 15:54:25
4 A. I haven't. I haven't but I 15:54:25
5 should. 15:54:27
6 Q. And then you post that the 15:54:28
7 final message in this chat on page COATES 15:54:34
8 432. Go ahead and read that. 15:54:38
9 A. "When asked about how the 15:54:41
10 company might deal with works that are 15:54:42
11 created on Lumi but alleged to have 15:54:44
12 infringed on preexisting copyrights, 15:54:47
13 Kaepernick responded, 'We're going to 15:54:49
14 build on the foundational models and 15:54:51
15 we're going to let the legislatures and 15:54:53
16 everybody figure out what the law and 15:54:55
17 parameters are going to be.'" 15:54:57
18 I found that very disappointing. 15:54:59
19 Q. Why? 15:55:02
20 A. It reflected a lack of 15:55:05
21 curiosity, as far as I was concerned. It 15:55:07
22 reflected an -- and I guess I found it 15:55:12
23 disappointing from someone who had been 15:55:15
24 lauded in part by people like me for his 15:55:20
25 courage. It lacked -- the idea that he 15:55:23

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2 would not engage in morally himself, that 15:55:30
3 he would not -- if he had an argument pro 15:55:33
4 this that he would not, you know, say 15:55:35
5 this is my argument for why we should be 15:55:37
6 able to do this, that he would just leave 15:55:39
7 it to people whose legitimately, in fact, 15:55:41
8 he's often questioned throughout his, you 15:55:45
9 know, career, his activism. That was 15:55:47
10 disappointing. 15:55:48
11 I should add, to be honest with you 15:55:49
12 too, Colin has had his share of 15:55:51
13 interactions with writers. Me being one 15:55:54
14 of them, in fact, and other writers I 15:55:58
15 know. And it's just disappointing that, 15:55:59
16 you know, he wouldn't have some sort of 15:56:02
17 conversation. 15:56:05
18 Q. Did you do any writing for or 15:56:05
19 about Colin? 15:56:07
20 A. About? It's possible I did 15:56:08
21 some writing about him when I was still 15:56:10
22 at The Atlantic. Although I don't know 15:56:12
23 the dates line up. But, no, I never did 15:56:15
24 any writing for him. 15:56:17
25 Q. Who is thumb down was this? 15:56:18

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2 A. I can't remember. 15:56:20

3 Q. I'm referring to the thumbs 15:56:21

4 down in response to your post. 15:56:23

5 A. Yeah, I'm not sure who that 15:56:25

6 was. 15:56:27

7 Q. And did the conversation end 15:56:27

8 with your post? 15:56:28

9 A. That did. And it looks like 15:56:29

10 two thumbs down, so it was two people. 15:56:30

11 (Deposition Exhibit 526, 15:56:59

12 text message thread COATES000433 15:56:59

13 to COATES000455 marked Confidential, 15:56:59

14 was marked for identification.) 15:57:00

15 Q. I'm going to hand you what's 15:57:00

16 been marked Exhibit 526. This is another 15:57:02

17 text chat. 15:57:04

18 A. Yeah. 15:57:08

19 Q. This is a text chain that you 15:57:21

20 printed off from your iPhone? 15:57:23

21 A. Yes. 15:57:25

22 Q. And your messages are in blue? 15:57:27

23 A. Yes. 15:57:29

24 Q. And the individuals you're 15:57:30

25 texting include Adam Serwer and Eve Ewing 15:57:33

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2 Q. Did she say how she knew 16:54:32
3 Mr. Clobes? 16:54:35

4 A. She did not. 16:54:35

5 Q. Did you vet him before you 16:54:36
6 hired him? 16:54:38

7 A. I did not. Ayelet used to be 16:54:38
8 a lawyer and is a graduate of Harvard Law 16:54:41
9 School. So I had faith in her. 16:54:44

10 Q. Okay. 16:54:46

11 (Deposition Exhibit 529, 16:55:05
12 text message thread COATES000456 16:55:05
13 to COATES000458 marked Confidential, 16:55:05
14 was marked for identification.) 16:55:05

15 Q. I'm handing you what's been 16:55:05
16 marked Exhibit 529. 16:55:08

17 A. Okay. 16:55:09

18 Q. Can you identify this for the 16:55:12
19 record. 16:55:14

20 A. This is me talking to Eve, I 16:55:21
21 believe. Yes, this is me talking to Eve 16:55:24
22 about Kaepernick and his effort. 16:55:27

23 Q. This happened around the same 16:55:32
24 time as the other thread that we looked 16:55:33
25 at? 16:55:35

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2 A. It did. And, as I was 16:55:35
3 mentioning before, both of us had kind of 16:55:38
4 -- Eve has, actually, worked with him. 16:55:40
5 She's actually done some work with him. 16:55:42
6 But we both know him rather informally. 16:55:44
7 So I was upset. 16:55:47

8 Q. I think that this is out of 16:55:48
9 order. Although I printed it in the same 16:55:50
10 order that it was produced. You'll see 16:55:53
11 it starts at Coates 456 and then it 16:55:54
12 continues to 457. 16:55:57

13 But if you turn to 457 -- 16:55:58

14 A. Right. 16:56:01

15 Q. -- it looks like that's the 16:56:02
16 beginning of the thread; isn't it? 16:56:04

17 A. Right. Yes. 16:56:06

18 Q. Or -- okay. 16:56:10

19 A. "I'm thinking I should call 16:56:13
20 Colin." I think that's the beginning. 16:56:15

21 Q. That's from you? 16:56:16

22 A. Yes. 16:56:17

23 Q. And you say, "This is very 16:56:18
24 bad"? 16:56:19

25 A. Yes. 16:56:19

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2 Q. She writes, "He's not going 16:56:20
3 to listen"? 16:56:22

4 A. Right. 16:56:22

5 Q. And then you say? 16:56:23

6 A. "This ain't that. This S is 16:56:25
7 F'ed up. He's hustling people." 16:56:29

8 She says, "It's extremely stupid. 16:56:30
9 I mean, call him." 16:56:33

10 Q. And you go on to say? 16:56:34

11 A. "I talked to search Sev 16:56:35
12 Ohinian about this pre-AI. It was a dumb 16:56:37
13 idea then." 16:56:39

14 They had -- I think I was saying, 16:56:41
15 they had no business. They had no 16:56:43
16 business. 16:56:45

17 "AI now gives them the appearance" 16:56:46
18 -- "'AI' now gives them the appearance of 16:56:48
19 business." 16:56:51

20 Q. And then going back to the 16:56:51
21 first page, we can see how that continued? 16:56:53

22 A. Yes. 16:56:55

23 Q. And then you said, "He's using 16:56:55
24 his protest image to hustle"? 16:56:57

25 A. Yes. 16:56:59

1 HIGHLY CONFIDENTIAL PURSUANT TO PO

2 Q. And she asks, "What would you 16:57:00
3 say?" 16:57:02

4 A. Yes. 16:57:02

5 Q. Referencing the hypothetical 16:57:03
6 call between you and Colin Kaepernick -- 16:57:04

7 A. Yes. 16:57:04

8 Q. -- correct? 16:57:06

9 A. Yes. 16:57:07

10 Q. And then you said? 16:57:08

11 A. "A lot of us admire you and 16:57:10
12 support you. This technology steals from 16:57:12
13 black writers and not just me, from 16:57:15
14 writers who came before us. "Zora, 16:57:17
15 Baraka," Ida B., that's what that should 16:57:20
16 be -- Ida B. Wells, "Frederick Douglass, 16:57:24
17 Dunbar. You are stealing from that to do 16:57:25
18 what exactly?" 16:57:27

19 Q. And you reference "Zora." 16:57:29
20 Give me a last name. 16:57:32

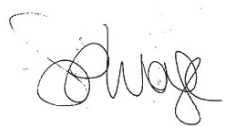
21 A. Sure, Zora Neale Hurston, 16:57:33
22 Amiri Baraka, Ida B. Wells, Paul Lawrence 16:57:36
23 Dunbar. 16:57:43

24 Q. Frederick Douglass is long 16:57:44
25 deceased, correct? 16:57:47

HIGHLY CONFIDENTIAL PURSUANT TO PO
CERTIFICATE OF REPORTER

I, SILVIA P. WAGE, CSR, CRR, RPR,
herby certify that the witness in the
foregoing deposition was by me duly sworn
to tell the whole truth, nothing but the
truth; said deposition was taken down in
shorthand by me, a disinterested person,
at the time and place therein stated. The
testimony of said witness was thereafter
reduced to typewriting by computer under
my direction and supervision. Before
completion of the deposition, review of
the transcript [X] was [] was not
requested. If requested, any changes
made by the deponent (and provided to
the reporter) during the period allowed
are appended hereto.

I further certify that I am not of
counsel or attorney for either or any
of the parties to the said deposition,
nor in any way interested in the event
of this cause, and that I am not
related to any of the parties thereto.

SIGNED: 
dated: December 5, 2024

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, ET AL.,
Individual and
Representative Plaintiffs

vs. CA NO. 3:23-CV-03417-VC

META PLATFORMS, INC., a
Delaware corporation,
Defendant

VIDEOTAPED DEPOSITION OF:

JUNOT DIAZ

COOLEY LLP

500 Boylston Street

Boston, Massachusetts

November 20, 2024 9:06 a.m.

Darlene M. Coppola, RPR, RMR, CRR

Page 1

1 Q. I'm going to have you take a look at 15:07:21
2 what's been marked as Exhibit 452. You'll 15:07:22
3 recognize it because it's the same post. 15:07:25
4 15:07:27
5 (Exhibit No. 452 marked for 15:07:27
6 identification.) 15:07:30
7 15:06:44
8 BY MR. GHAJAR: 15:06:44
9 Q. Right? It's the same post as 15:07:34
10 Exhibit 451? 15:07:35
11 A. Yes. 15:07:40
12 Q. This one is -- this one doesn't get 15:07:41
13 cut off. 15:07:42
14 Do you see that? 15:07:43
15 A. Yes. 15:07:43
16 Q. Meaning you wrote the first sentence, 15:07:44
17 and then the rest of it is quoted from the 15:07:49
18 article, correct? 15:07:50
19 A. Yes. 15:08:05
20 Q. Are you part of a lawsuit against 15:08:06
21 Bloomberg? 15:08:07
22 A. Not that I know of. 15:08:09
23 Q. It says, "Books3 was also used to 15:08:11
24 train Bloomberg's BloombergGPT." And if 15:08:15

1 Books3 is the dataset that supposedly contains 15:08:19
2 copies of your books, is there any reason why 15:08:28
3 you didn't also sue Bloomberg? 15:08:29
4 A. I don't know. 15:08:35
5 Q. So in Exhibit 452, it's an expanded 15:08:35
6 view of your Facebook post from August 20, 15:08:38
7 2023, correct? 15:08:40
8 A. It is. 15:08:42
9 Q. And you reproduce a number of lines 15:08:46
10 from "The Atlantic" article within your post, 15:08:50
11 correct? 15:08:53
12 A. I do. 15:08:53
13 Q. And in this particular article -- 15:08:54
14 strike that. 15:08:57
15 In this particular instance, your post 15:08:58
16 was shared 38 times, correct? 15:08:59
17 A. Yes. 15:09:01
18 Q. And you engage with some of your 15:09:03
19 followers within the comment section, 15:09:06
20 correct? 15:09:08
21 A. Yes. 15:09:08
22 Q. Did you strike along with the Writers 15:09:17
23 Guild? 15:09:20
24 A. I did. 15:09:20

1 Q. And you are aware that that strike was 15:09:21
2 resolved, correct? 15:09:26
3 A. I am aware of that. 15:09:27
4 Q. And guidelines were put in place over 15:09:30
5 the use of AI by studios and writers, correct? 15:09:31
6 A. I am aware of that, yes. 15:09:34
7 Q. Are you willing to use AI yourself for 15:09:37
8 your writing and ideation process? 15:09:40
9 A. No. 15:09:45
10 Q. Were you part of the strike Writers 15:09:57
11 Guild WhatsApp threat? 15:10:02
12 A. No. 15:10:04
13 Q. Were you aware that there was one? 15:10:04
14 A. I heard but beyond that -- 15:10:06
15 Q. You never were added? 15:10:08
16 A. No, I didn't want to be added. 15:10:09
17 Q. You were offered but declined? 15:10:11
18 A. No. It's just people had floated that 15:10:13
19 it was up, as in maybe you might want to 15:10:15
20 pursue it. And I just don't need more 15:10:17
21 information streams. 15:10:20
22 Q. You can set that aside. 15:10:26
23 I'm going to hand you what's been 15:10:35
24 marked Exhibit 453. 15:10:36

1 Q. And you believe it's a fair use, sir, 15:26:30
2 because it was only one of approximately 90 15:26:31
3 articles or so, and so, in your view, that was 15:26:36
4 de minimis? Is that another way of saying it? 15:26:43
5 It was one of 90; it wasn't a lot? 15:26:45
6 A. In the sense that, again, we were -- I 15:26:47
7 was always taught that one poem out of 20, 15:26:49
8 safe. More, trouble. 15:26:55
9 Q. That was the barometer you were 15:27:00
10 using? 15:27:02
11 A. Yeah, we were raised on. 15:27:02
12 Q. I'm going to hand you what's been 15:27:09
13 marked as Exhibit 458. Sorry about the... 15:27:11
14 A. No worries. 15:27:13
15 Q. Trying to clear the cables with my 15:27:14
16 throw. 15:27:17
17 15:27:18
18 (Exhibit No. 458 marked for 15:27:18
19 identification.) 15:27:23
20 15:27:23
21 BY MR. GHAJAR: 15:27:23
22 Q. This is an article you posted on 15:27:24
23 October 26 of this year; is that correct? 15:27:25
24 A. Yes, "For College Students, Giving Up 15:27:29

1 on Books is a Perfectly Sensible Choice." 15:27:31

2 That was the title. 15:27:40

3 Q. And you contributed the first two 15:27:44

4 sentences to this post? 15:27:47

5 A. That's all, yes. 15:27:48

6 Q. And then the rest was copied verbatim 15:27:49

7 from the article on NewYorkTimes.com? 15:27:52

8 A. It was. 15:28:00

9 Q. And was that article sitting behind a 15:28:01

10 paywall? 15:28:02

11 A. It was. 15:28:03

12 Q. And you posted the entirety to your 15:28:04

13 Facebook page, to your followers? 15:28:06

14 A. I did. 15:28:07

15 Q. So you copied it -- you reproduced it 15:28:08

16 without permission, and then you posted it on 15:28:12

17 your Facebook page to your 150,000-plus 15:28:16

18 followers to read? 15:28:18

19 A. I did. 15:28:19

20 Q. Set that aside. 15:28:23

21 Exhibit 459. 15:28:31

22 15:28:32

23 15:28:32

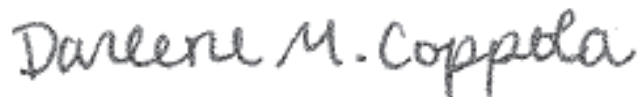
24 (Exhibit No. 459 marked for 15:28:32

CERTIFICATION

I, DARLENE M. COPPOLA, a Notary Public, do hereby certify that JUNOT DIAZ, after having satisfactorily identifying himself, came before me on the 20th day of November, 2024, in Boston, Massachusetts, and was by me duly sworn to testify to the truth and nothing but the truth as to his knowledge touching and concerning the matters in controversy in this cause; that he was thereupon examined upon his oath and said examination reduced to writing by me; and that the statement is a true record of the testimony given by the witness, to the best of my knowledge and ability.

I further certify that I am not a relative or employee of counsel/attorney for any of the parties, nor a relative or employee of such parties, nor am I financially interested in the outcome of the action.

WITNESS MY HAND THIS 5th day of December, 2024.



DARLENE M. COPPOLA

My commission expires:

NOTARY PUBLIC

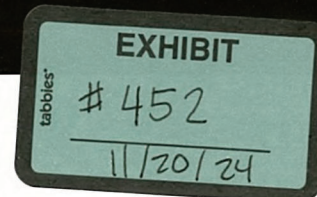
November 2, 2029

REGISTERED MERIT REPORTER

CERTIFIED REALTIME REPORTER

Page 378

https://www.facebook.com/junotdiaz.writer/posts/pfbi_d0j9usfFoCvXXQ9zJGZhk34XnqUQnR8pYho5nszPh6NjPJQcUyZkPKCd99AmGh9aHKI?rdid=hzU86tveSpULWAOB# November 17, 2024 at 10:41 PM EST

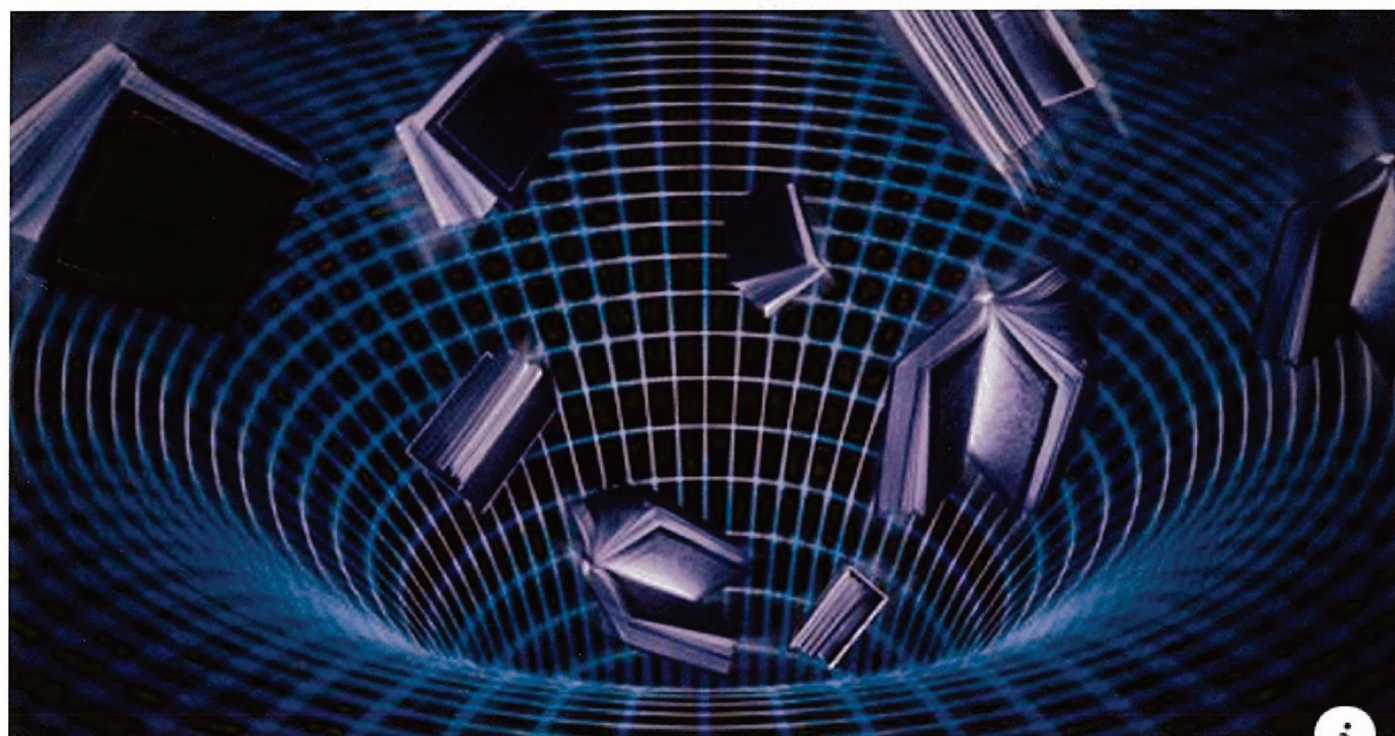


Junot Díaz

August 20, 2023 ·

Zero surprise: my writing is among those being stolen by these AI assholes. Reisner for The Atlantic: "Pirated books are being used as inputs for computer programs that are changing how we read, learn, and communicate. The future promised by AI is written with stolen words.

... In addition to work by Silverman, Kadrey, and Golden, nonfiction by Michael Pollan... thrillers by James Patterson and Stephen King and other fiction by George Saunders, Zadie Smith, and Junot Díaz. These books are part of a dataset called "Books3," and its use has not been limited to LLaMA. Books3 was also used to train Bloomberg's BloombergGPT, EleutherAI's GPT-J—a popular open-source model—and likely other generative-AI programs now embedded in websites across the internet. A Meta spokesperson declined to comment on the company's use of Books3; Bloomberg did not respond to emails requesting comment; and Stella Biderman, EleutherAI's executive director, did not dispute that the company used Books3 in GPT-J's training data.



i

THEATLANTIC.COM

Revealed: The Authors Whose Pirated Books Are Powering Generative AI

Stephen King, Zadie Smith, and Michael Pollan are among thousands of writers whose copyrig...

160

23 comments 38 shares

Like

Comment

Send

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All comments ▼

**Erich Thaler**

ALL artists are getting robbed. I'm seeing a lot of writers worried about writers, artists worried about artists - you could say it goes without saying that our concern is for all, however, as a writer, you know we must 'show' or most people ain't gonna get it. It's easier for AI to steal from text, but all of us who have used the internet to distribute our works are being used. As one of our currently walking the earth leading writers, I am happy you are taking this up - however, we must broaden the message, looks like you are already down the rabbit hole, please broaden your inquiry of their exploitation of human art

1y Like Reply Edited 3 👍



Author

Junot Díaz ✓

Erich Thaler you tell no lies - capitalism will steal from everyone living and dead. and this issue (among others) is what those of us on strike in hollywood are fighting against (FYI: im in the writers guild of america east)

1y Like Reply

13 👍 🤔

**Erich Thaler**

Stealing from everyone, truth! We unwittingly pay the freight of our own demise. I hope this strike establishes an AI framework that can be a model for the other arts, we can't piecemeal this, and it ain't going away. Large agreements like the one at the end of your strike will have spill over benefits that I hope will help all. The hotel workers are on my mind too. In solidarity I haven't gone to a movie or stayed in an LA hotel since the beginning, and happy I don't work as a rigger anymore! Thanks for getting back! walking the line gonna be for the hard today and tomorrow, stay dry!

1y Like Reply

**Erich Thaler**

On a nuts and bolts front- this Books3 data set is interesting/troubling - who nominally owns it? and I wonder what other data sets are packaged and being traded out there. the 'great portrait artists' data set? hmmm. It prob goes way deeper.

1y Like Reply

**Joe Stevenson**

So many people marveling at "AI", when most of it is just slightly modified STOLEN work.

I've worked in automation for 35 years. I'm not impressed with what they are calling

"AI" these days.

1y Like Reply 8 




 Top fan

James Gaiser


Yeah I thought it was weird when chat GPT suggested " the four horse faces of the apocalypse"

...

1y Like Reply 



 Author

Junot Díaz 

...

James Gaiser that's a deep cut lolol

1y Like Reply



 Top fan

James Gaiser

...

Junot Díaz lololol One of my favorites bro!

1y Like Reply



Michael Schwarz

The real question is whether using copyrighted works as training data violates the law. There is a pretty sound argument that it does not either because the training process doesn't involve making copies or creating derivative works or because it's fair use. Right now the law is uncertain. But we should have at least a tentative answer soon.

...

1y Like Reply



Tania Hallal

I cannot believe this...

...

1y Like Reply



Chansi Rose Long

this is beyond fucked up.

...

1y Like Reply



Leo Leonardo

Hope you and other writers get together and sue Meta and Bloomberg!

...

1y Like Reply 2 



David Haller

"Why does my AI content always feature evil clowns having a farting contest?"

...

Stephen King grins mischievously.

1y Like Reply



Estil Nuyork · Follow

The interactions between humans, AI, corporations, and the ethical considerations involved are super complex due to our entering into these opaque contracts with the companies behind these public large language models (LLMs).

The progression of AI from narrow applications to more multi-modal (text, speech, image recognition, sound identity, etc.) and potentially artificial general intelligence (AGI)-level capabilities raises a lot of questions about the relationship between humans, their intellectual property (IP) and technology.

There is also concerns about not just privacy, but addiction and dependency, as we rely more on AI to help us realize new ways of doing things.

Many sci-fi movies have touched on what may lay just beyond: self-awareness (maybe as close as 2030) and possibly seeking its own "freedom" or interests. This brings up a whole other bowl of philosophical brain twisters about the nature of consciousness, intelligence, and autonomy. As we integrate AI more deeply into our lives, the ethical dimensions of these interactions and the long-term consequences need to be explored and addressed before they happen. However, the exponential growth of AI makes that difficult, putting most of us in a "wait-and-see-what-happens" mode because we have no other choice.

Transparency, accountability, and responsible development are vital as we navigate this journey. Balancing the potential benefits of AI and AGI with their potential risks is a challenge that's gonna require collaboration between scientists, policymakers, ethicists, and society as a whole.

The runaway-train progress of AI and the potential for AGI demand ongoing and thoughtful dialogue to ensure that as we advance technologically, we do so in a way that aligns with our values and priorities. But who is "our"? The users that provide the input have little control over how that input is used, and reused.

As we move forward, ethical considerations need to be at the forefront of AI development and deployment to create a future where the positive outcomes outweigh the challenges of killer robots shutting off our electricity after stealing everything.

#somosmás

1y Like Reply Edited



Scott Liapis

Why hasnt legislation been passed to stop this? Would it even be impossible to police worldwide? Very concerning

1y Like Reply



William Vélez

Sue their asses!

1y Like Reply



Max Renn
Richard Kadrey ...

1y Like Reply



Paula Gleeson

I wonder if the COVID pandemic isn't a useful metaphor to view the viral properties of AI. For a brief moment we were given a clear view of the deep ravages of inequities wrought by neoliberalism, and of the possibilities of collective care and attention. For a moment there was no looking away, nothing else to make eye contact with. For all of the sacrifice, all of the lives tragically lost and irrevocably changed, we had a sight-line to taking responsibility for humanity...but we seemed to have looked away. We returned instead to sleep walking into an humanity stealing epoch, oblivious to the possibilities of attention and care, handing over our humanity to an undeserving few for the sake of shiny baubles. Indeed reflecting upon the nonsense of the cage fight in Rome between two of those undeserved, you cannot help but feeling the whole scenario and script are being written by AI...

1y Like Reply



Dorothy Potter Snyder

Please join the PEN America and the Author's Guild, if you are not a member already, Junot. These two organizations need all of our support in the fight against the AI monster. Also, as we become justifiably upset about this theft, please let us remember that women's words and art and scientific achievements have been stolen for CENTURIES.

1y Like Reply Edited



Gia Puja

Imitation is the sincerest form of flattery. (Also, eff those creativity-lacking, dishonoring, opportunistic d*ckheads.)

1y Like Reply



Bob Black

No surprise. Google Gutenberg Project was nefarious from the beginning. Fuck these asswipes

1y Like Reply



Top fan

Jose Sotolongo

You, Saunders, and Smith have very different styles but you share a strong sense of structure and flow. So it's kind an affront but also a sort of flattery. This new industry needs regulation before it steps over the line of plagiarism without a legal recourse for victimized writers.

1y Like Reply



Carrie Miller
Sue their asses! ...

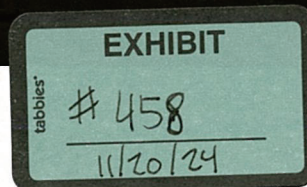
1y Like Reply

https://www.facebook.com/junotdiaz.writer/posts/pfbi_d02Rrvd5VmmWGzedS4a2sxreZwjozybg2bWB21uQvNEezeh6jvehtxjdWsFV2x9JbH8I?rdid=kV RQRxGhnWBCyrPP November 17, 2024 at 10:33 PM EST



Junot Díaz

October 26 at 9:51 AM ·



...

I myself have reduced the number of books my students read each semester. We're hovering around three per course and the number of students who confess that they weren't able to finish all the assigned books has been growing ... Malesic for NYT: "In 2011, I taught a college class on the meaning and value of work. It was a general-education class, the sort that students say they have to "get out of the way" before they move on to their major courses. Few of the students were avid readers, and many held jobs that constrained their study time.

I assigned them nine books. I knew I was asking a lot, but the students did great. Most of them aced their reading quizzes on Henry David Thoreau's "Walden" and Plato's "The Republic." In class, our desks in a circle, we had lively discussions.

After 13 years that included a pandemic and the advent of generative A.I., that reading list seems not just ambitious but absurd. I haven't assigned an entire book in four years.

Nationwide, college professors report steep declines in students' willingness and ability to read on their own. To adapt, instructors are assigning less reading and giving students time in class to complete it.

It's tempting to lament the death of a reliable pathway to learning and even pleasure. But I'm beginning to think students who don't read are responding rationally to the vision of professional life our society sells them. In that vision, productivity does not depend on labor, and a paycheck has little to do with talent or effort. For decades, students have been told that college is about career readiness and little else. And the task of puzzling out an author's argument will not prepare students to thrive in an economy that seems to run on vibes.

Recent ads for Apple Intelligence, an A.I. feature, make the vision plain. In one, the actor Bella Ramsey uses artificial intelligence to cover for the fact they haven't read the pitch their agent emailed. It works, and the project seems like a go. Is the project actually any good? It doesn't matter. The vibes will provide.

Even in the ostensibly true depictions of working life that students see, like the "day in my life" videos that were popular on TikTok a couple of years ago, intellectual labor seems optional and entry-level corporate positions seem like a series of rooftop hangouts, free lunches and team-building happy hours — less a job than a lifestyle. And of course the ultimate lifestyle job is being an influencer, a tantalizing prospect that seems always just one viral post away.

The most visible college students are big-time athletes, who these days can earn money — in some cases, millions of dollars — through sponsorship deals. But however hard these students push themselves, their earnings are officially not for their work on the field but for their marketability off it.

Once students graduate, the jobs they most ardently desire are in what they proudly call the "sellout" fields of finance, consulting and tech. To outsiders, these industries are abstract and

opaque, trading on bluster and jargon. One thing is certain, though: That's where the money is.

All in all, it looks as if success follows not from knowledge and skill but from luck, hype and access to the right companies. If this is the economy students believe they're entering, then why should they make the effort to read? For that matter, how will any effort in school prepare them for careers in which, apparently, effort is not rewarded?

Given all this, it's easy to lose faith in humanistic learning. Universities themselves offer little solace. They constantly promote the idea that a degree is about earning power above all else. They embrace influencer culture and probably benefit from viral phenomena like Bama Rush. They certainly aren't shooing away corporate recruiters.

But teaching is an inherently hopeful profession, and as much as students worry me, they also give me hope. I often see my writing students push themselves past what's easy or rational. They get excited about their research projects; sometimes they even ponder whether to use a period or a semicolon to separate two sentences.

The fact is, not all students aim to sail on vibes. Some want to do work that makes more than money. Some finance majors do, too. And others, God bless them, just want to learn what they can and worry about work later.

It's up to students to decide whether they'll resist intellectual inertia. All I can do is demonstrate that it is worth it to read, to pause, to think, to revise, to reread, to discuss, to revise again. I can, in the time students are with me, offer them chances to defy their incentives and see what happens.

I need to get back to assigning books. Nine is too many. But one? They can read one. Next semester, they will."




NYTIMES.COM

Opinion | For College Students, Giving Up on Books Is a Perfectly Sensible Choice


The world is sending a message about its priorities, and they do not appear to include "Moby-...

   127

17 comments 47 shares

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 Comment

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Most relevant ▼



Ina Klimover

As a German who is still naively holding up the good old concept of "Bildung" (roughly: education not as job training but to become a more rounded, more complete and aware human being) I'd say the core of the problem seems to be how society often views knowledge and education (i.e. as a step stone rather than an end in itself). And yes, dedicating years of your adult life to improving your mind primarily for the sake of its own is a form of privilege but here in Germany universities are mostly free and students from low income families get Bafög which is 50% free money and 50% interest-free loan. ...

3w Like Reply  8



 Author

Junot Díaz ✓

Ina Klimover we need more of that at a planetary level. ...

2w Like Reply

 6



Lisette Morel


I'm still hopeful Junot Díaz as a teaching artist mom I'm constantly encouraging my daughters and students to ask questions and to read. Sometimes I read short stories to connect our art assignments to history to culture. Now, after reading this, I will... See more ...

3w Like Reply 



Anthony Lioi

It's important to remember that a Great Books education at elite British and North American universities was a feeder system for imperial bureaucracies. Read Latin and Greek and then get a cushy job in the Raj. After WW2, a liberal arts education prom... See more ...

3w Like Reply  6



Liz Keptner

Beth Michalec ...

2w Like Reply 



Terra Grayson

I am a high school teacher. My students do not read. Since AI came out, they no longer write. They are too socially anxious to discuss.

I have decided that teaching is no longer a good use of my time. When I have to spend all of those long, unpaid hours doing work for my classroom to create a curriculum that is rigorous and will allow them to master the state standards, which they don't engage with because they see no profit in it, it is a waste of time. They are a mercenary generation. So, I have decided to stop doing all of that. I can make pretty good money as a substitute. I will still be in the classroom, still be engaging with the kids, which is, as every teacher knows, the best part of the job. But all the staff meetings, and PLCs, and lesson planning, and grading, and all the rest of it? No. If I can't teach the kids, why should I bother with the rest of it?

Many, many teachers are so disheartened with post-pandemic teaching that, nationally, there is an enormous conversation going on about quitting. Something must be done if the public wants teachers, because this is untenable.

3w Like Reply Edited 7 🙄🤔😱



Vanessa Blakeslee

Pathetic and tragic. What's even the point of pursuing higher learning? Meanwhile, I feel like I've gone from teaching university-level to middle school over the past 20 years, and I never wanted to teach middle school. This does not bode well for our civilization.

3w Like Reply 5 👍



Edwin Castro

Lack of reading can lead to a lack of imagination. Nothing good can come from lacking imagination 😞

3w Like Reply 4 👍



Latesha Thornhill

I also think colleges do a terrible job of selling humanities. ...

3w Like Reply 4 👍



Steve Smith

Depth > breadth ...

3w Like Reply

Most relevant is selected, so some comments may have been filtered out.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----x

RICHARD KADREY, et al.,

Individual and

Representative Plaintiffs,

vs.

Case No.

META PLATFORMS, INC., a

3:23-cv-03417-VC

Delaware corporation,

Defendant.

-----x

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF

CHRISTOPHER GOLDEN

Boston, Massachusetts

Reported by:

MaryJo O'Connor, RDR, RMR

Job No: 6917590

PAGES 1 - 407

Page 1

CONFIDENTIAL

1 A. I don't remember. 11:35:55

2 Q. Other than have you written any 11:35:55

3 op-eds or articles in a newspaper -- 11:35:57

4 A. No. 11:35:59

5 Q. -- about generative AI? 11:35:59

6 A. No. 11:36:02

7 Q. Have you give any interviews about 11:36:02

8 generative AI? 11:36:04

9 A. Not that I recall. 11:36:06

10 Q. Speaking of generative AI, it's a 11:36:12

11 term I've used. Can I get your understanding 11:36:14

12 of what it means? 11:36:18

13 A. It means that a company 11:36:18

14 essentially steals massive amounts of data so 11:36:24

15 that it can create an app that will spit out a 11:36:27

16 crappy computer version of something that a 11:36:35

17 human should have done. 11:36:37

18 Q. That's your definition of 11:36:38

19 generative AI? 11:36:41

20 A. It is. 11:36:42

21 Q. Can you identify any companies 11:36:47

22 that are developing generative AI? 11:36:49

23 A. You mean besides Meta and ChatGPT 11:36:51

24 and what you just told me about Grok? 11:36:55

25 Q. Sure. Other than Meta, OpenAI 11:36:58

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CONFIDENTIAL

1 personal feelings of certain members of 11:56:19
2 the HWA leadership." 11:56:21

3 If we're referring specifically 11:56:23
4 to the phrase "fuck AI," in the sense that I 11:56:26
5 believe in reposting this refers to the 11:56:33
6 theft of our materials, our copyrighted 11:56:35
7 materials and infringements by companies 11:56:37
8 like Meta, then, yes, I agree with that 11:56:39
9 sentiment. 11:56:41

10 Q. Do you agree with Mr. Keene's 11:56:42
11 sentiment that when he says "F AI"? 11:56:44

12 A. In the sense that he's clearly, to 11:56:51
13 my knowledge, referring to the fact that the 11:56:55
14 use of AI is not something that we should 11:56:57
15 respect when it comes to writing, 11:57:00
16 quote-unquote, writing or generating stories, I 11:57:03
17 agree. 11:57:06

18 And in the sense that he's also 11:57:07
19 referring to the fact that companies like Meta 11:57:09
20 have stolen our copyrighted materials in their 11:57:14
21 entirety without doing anything to transform it 11:57:21
22 into a, you know, something that would be more 11:57:26
23 useful, you know, and could have come to us at 11:57:29
24 the beginning to license the material from us, 11:57:32
25 could have done everything aboveboard, you 11:57:34

Page 168

CONFIDENTIAL

1 know, have \$1.3 trillion and could easily have 11:57:37
2 made a deal to do that, fuck AI. Yes, I agree 11:57:42
3 with Brian. 11:57:45

4 Q. You just used some terminology I 11:57:45
5 want to pick up on. 11:57:45

6 A. Okay. 11:57:45

7 Q. You said, "Without doing anything 11:57:47
8 to transform it into, you know, something that 11:57:49
9 would be more useful." What is that referring 11:57:53
10 to? Where did you get that language from? 11:57:56

11 A. Well, I spent -- let's see. My 11:57:57
12 first three years out of school, I worked for 11:58:00
13 BPI Communications. I worked in licensing, and 11:58:03
14 I'm familiar with fair use laws. I represented 11:58:07
15 myself as an agent -- well, I agented my own 11:58:10
16 work for eight years, so I'm familiar with the 11:58:14
17 concepts of fair use. 11:58:16

18 Q. So that's what you're referring 11:58:17
19 to -- 11:58:19

20 A. Yeah. 11:58:19

21 Q. -- when you made that comment? 11:58:20

22 A. Sure. 11:58:21

23 Q. Okay. Have you read any fair use 11:58:21
24 legal decisions? 11:58:23

25 A. No. 11:58:24

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CONFIDENTIAL

C E R T I F I C A T E

I, MaryJo O'Connor, a Notary Public
in and for the Commonwealth of
Massachusetts, do hereby certify:

That CHRISTOPHER GOLDEN, the
witness whose testimony is hereinbefore set
forth, was duly sworn by me and that such
testimony is a true and accurate record of
my stenotype notes taken in the foregoing
matter to the best of my knowledge, skill
and ability.

IN WITNESS WHEREOF, I have hereunto
set my hand and Notarial Seal this 30th day
of September 2024.



MARYJO O'CONNOR, RDR/RMR
Notary Public

My Commission expires:
September 12, 2025

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CASE NO. 3:23-CV-03417-VC

RICHARD KADREY, ET AL)

)

Individual and)

Representative Plaintiffs,)

)

VS.)

)

META PLATFORMS, INC., A DELAWARE)

CORPORATION)

)

Defendant.)

/

DEPOSITION OF RICHARD KADREY
VIDEOTAPED

DEPOSITION taken before me, Brenda J. Brink, a
Notary Public, within and for the Commonwealth of
Pennsylvania, beginning at 9:35 a.m. on September 25,
2024, at the offices of Regus - Foster Plaza
Pittsburgh, 651 Holiday Drive, Plaza 5, Suite 400,
Pittsburgh, Pennsylvania, 15220, to be used pursuant
to all applicable rules in the aforesaid cause of
action, pending in the United States District Court,
Northern District of California, San Francisco
Division.

1 A. I have never used generative AI
2 except for Midjourney.

3 Q. Is there a reason why you haven't
4 tried the text based -- text based
5 generative AI?

6 A. I objected to the idea of it.

7 Q. So even before you had a belief
8 that your works were used to train the AI,
9 you didn't want to use the AI?

10 A. Exactly.

11 Q. And what was the basis for your
12 objection before you knew that your works
13 were allegedly part of the training?

14 A. It felt like cheating. It felt
15 like looking over somebody's shoulder to
16 get the answer to a question.

17 Q. Okay. Can you think of any --
18 assuming that the copyright concerns about
19 the training of generative AI were
20 addressed, can you think of any beneficial
21 use of generative AI that's textual in
22 nature?

23 MR. ZIRPOLI: Object to the form
24 of that question.

25 A. Repeat the question, please.

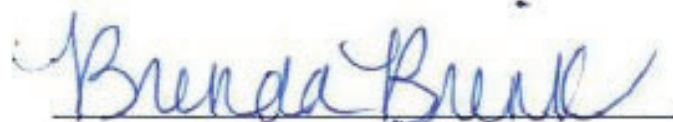
COMMONWEALTH OF PENNSYLVANIA)
) CERTIFICATE
COUNTY OF ALLEGHENY) SS:

I, Brenda J. Brink, RPR and Notary Public in and for the Commonwealth of Pennsylvania, do hereby certify that the witness, Richard Kadrey, was by me first duly sworn to testify to the truth; that the foregoing deposition was taken at the time and place stated herein; and that the said deposition was recorded stenographically by me and then reduced to printing under my direction, and constitutes a true record of the testimony given by said witness.

I further certify that the inspection, reading and signing of said deposition were NOT waived by counsel for the respective parties and by the witness.

I further certify that I am not a relative or employee of any of the parties, or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 11th day of October, 2024.



Notary Public

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION
RICHARD KADREY, ET AL)
Plaintiffs) Case No.: 3:23-cv-03417-VC
Vs.)
META PLATFORMS, INC.,)
A Delaware Corporation)
Defendant)

Deposition of LAURA LIPPMAN, was taken
via videotape on Tuesday, September 17, 2024,
commencing at 9:32 a.m., at Kramon & Graham, P.A.,
750 East Pratt Street, Suite 1100, Baltimore,
Maryland, before MICHELE D. LAMBIE, Notary Public.

Reported By:
Michele D. Lambie, CSR-RPR

1 BY MS. DUNNING: 01:16:40

2 Q. Do you have an opinion about whether it 01:16:40

3 would be morally inappropriate to feed one's work 01:16:49

4 into a generative AI model to iterate on the 01:16:56

5 content? 01:17:07

6 MR. SWEATMAN: Objection to form. 01:17:08

7 THE WITNESS: I'm not sure I know what to 01:17:09

8 iterate on the content means. 01:17:14

9 BY MS. DUNNING: 01:17:15

10 Q. What if I wanted to put a short story 01:17:15

11 into an LL -- a short story that I wrote into an 01:17:19

12 LLM and ask it to suggest ideas for a sequel or a 01:17:22

13 follow-on story. Any opinions on whether that 01:17:33

14 would be an appropriate or morally inappropriate 01:17:36

15 use of generative AI? 01:17:41

16 MR. SWEATMAN: Objection to form. 01:17:43

17 THE WITNESS: I really haven't developed 01:17:44

18 any opinions about AI in a moral context. 01:17:48

19 BY MS. DUNNING: 01:17:55

20 Q. In what context, if any, have you 01:17:55

21 developed opinions about AI? 01:17:59

1 A. I have an opinion about AI that centers 01:18:01
2 on the creative aspect. 01:18:10

3 Q. And what are those opinions? 01:18:14

4 MR. SWEATMAN: Objection to form. 01:18:17

5 THE WITNESS: I don't understand why a 01:18:18
6 writer would do that. 01:18:26

7 BY MS. DUNNING: 01:18:27

8 Q. What about the act -- well, what do you 01:18:27
9 mean why a writer would do that? Do what? 01:18:36

10 A. I do not understand why a writer would 01:18:40
11 use AI tools with the goal of creating work or 01:18:45
12 improving upon work that's already been created. 01:18:55

13 Q. Is that because you don't think that AI 01:18:57
14 tools are capable of improving the work? 01:19:02

15 MR. SWEATMAN: Objection to form. 01:19:07

16 THE WITNESS: To the extent that I 01:19:07
17 understand AI, which is, obviously, something that 01:19:11
18 is debatable, my understanding of AI is that it can 01:19:17
19 only deal with things that already exist and its 01:19:25
20 ability to create something new may be limited, 01:19:36
21 but, again, that's based on my limited 01:19:42

1 understanding of AI. 01:19:44

2 BY MS. DUNNING: 01:19:46

3 Q. Have you -- are you aware of any examples 01:19:46

4 of AI being prompted to suggest a recipe? 01:19:51

5 A. I feel like I've heard some secondhand 01:20:00

6 chatter about AI being asked to provide information 01:20:03

7 like recipes. 01:20:09

8 Q. Have you heard of anyone using a large 01:20:12

9 language model to develop an itinerary for travel? 01:20:19

10 A. Personally, I have not. 01:20:24

11 Q. Have you -- are you aware of use by 01:20:25

12 doctors and medical researchers of AI tools to 01:20:31

13 identify disease? 01:20:35

14 MR. SWEATMAN: Objection to form. 01:20:38

15 THE WITNESS: I don't think I do know 01:20:39

16 about that. 01:20:43

17 BY MS. DUNNING: 01:20:44

18 Q. Are you aware of instances in which 01:20:44

19 generative AI tools have been used by the disabled 01:20:49

20 to write or create art that they might not 01:20:52

21 otherwise be able to create? 01:20:55

1 State of Maryland

2 County of Baltimore, to wit:

3 I, Michele D. Lambie, a Notary Public of
4 the State of Maryland, County of Baltimore, do
5 hereby certify that the within-named witness
6 personally appeared before me at the time and place
7 herein set out, and after having been duly sworn by
8 me, according to law, was examined by counsel.

9 I further certify that the examination
10 was recorded stenographically by me and this
11 transcript is a true record of the proceedings.

12 I further certify that I am not of
13 counsel to any of the parties, nor related to any
14 of the parties, nor in any way interested in the
15 outcome of this action.

16 As witness my hand and notarial seal this
17 2nd day of October 2024.

18
19 
20
21